

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**STAG WILLIAMSPORT, LLC,**

*Plaintiff*

**V.**

**BNH ASSOCIATES, LLC, FIRST  
AMERICAN TITLE INSURANCE  
COMPANY, and *in rem* against  
CERTAIN FUNDS HELD IN ESCROW  
BY THE BOSTON OFFICE OF  
FIRST AMERICAN TITLE  
INSURANCE COMPANY,**

***Defendants.***

[illegible]

**Civil Action No. 1:21-cv-11958-NMG**

**ASSENTED MOTION TO EXTEND TIME**  
**TO FILE OPPOSITION TO MOTION TO DISMISS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff STAG Williamsport, LLC (“STAG” or “Plaintiff”) respectfully requests that this Court extend the deadline for STAG to respond to Defendant BHN Associates, LLC’s (“BHN”) Motion to Dismiss or Transfer (“Motion to Dismiss”), by ten days, from December 27, 2021 up to and including January 6, 2022. In support of this request, STAG states as follows:

1. On October 1, 2021, STAG filed its Complaint in Massachusetts Superior Court.
2. On December 5, 2021, BHN removed the action to this Court.
3. On December 13, 2021, BHN filed its Motion to Dismiss.
4. STAG's response is current due on December 27, 2021.

5. Due to the intervening holidays, STAG requires additional time to prepare its response.

6. BHN has assented to this request.

7. No party will be prejudiced by granting the requested extension.

Wherefore, STAG respectfully requests that this Court extend the deadline for STAG to respond to the Motion to Dismiss, by ten days, from December 27, 2021 up to and including January 6, 2022.

Respectfully submitted,

STAG WILLIAMSPORT, LLC

By its attorneys,

/s/ Benjamin M. Greene

Benjamin M. Greene, BBO# 696850

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Date: December 20, 2021

**CERTIFICATE OF SERVICE**

I, Benjamin M. Greene, hereby certify that on this 20th day of December, 2021, I caused a copy of the within document to be filed and served on all counsel of record via the electronic filing system for the U.S. District Court, District of Massachusetts.

/s/ Benjamin M. Greene  
Benjamin M. Greene